

CAUSE NO. D-1-GN-11-003130

THE TEXAS TAXPAYER & STUDENT  
FAIRNESS COALITION, et al;  
CALHOUN COUNTY ISD, et al;  
EDGEWOOD ISD, et al;  
FORT BEND ISD, et al.,

Plaintiffs,

JOYCE COLEMAN, et al.,

Intervenors,

vs.

ROBERT SCOTT, COMMISSIONER  
OF EDUCATION, IN HIS OFFICIAL  
CAPACITY; SUSAN COMBS,  
TEXAS COMPTROLLER OF PUBLIC  
ACCOUNTS, IN HER OFFICIAL  
CAPACITY; TEXAS STATE BOARD  
OF EDUCATION,

Defendants.

IN THE DISTRICT COURT

TRAVIS COUNTY, TEXAS

200<sup>th</sup> JUDICIAL DISTRICT

**MIGUEL A. PEREZ VARGAS'S MOTION PRO HAC VICE**

I, Miguel A. Perez Vargas, file this motion *pro hac vice* to appear before the court, under the authority of the Rules Governing Admission to the Bar of Texas, Rule XIX.

**A. Facts**

1. I am associated with David G. Hinojosa, who will personally participate in the trial of this case. David G. Hinojosa is a practicing attorney and a member of the State Bar of

Texas. His State Bar card number is 24010689 and his office address, telephone number, and fax number is: MALDEF, 110 Broadway, Suite 300, San Antonio, TX 78205, 210-224-5476, 210-224-5382.

2. I am an active member in good standing with the State Bar of Puerto Rico and the federal courts of the District of Puerto Rico and the Court of Appeals for the First Circuit.

3. I have not been the subject of disciplinary action in the last five years by the bar or courts of any jurisdiction in which I have been licensed.

4. I have not been denied admission to the courts of any state or to any federal courts during the last five years.

5. I am familiar with the State Bar Act, the State Bar Rules, and the Texas Disciplinary Rules of Professional Conduct governing conduct of members of the State Bar of Texas. I will at all times abide by and comply with those rules as long as this cause of action is pending, and I have not withdrawn as counsel from the proceeding.

6. The cases and causes in which I have appeared or sought leave to appear in Texas courts in the last two years are: None.

7. My office address, telephone number and fax number are indicated below my signature.

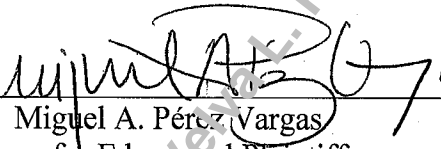
#### B. Prayer

8. For these reasons, I ask this court to grant my motion *pro hac vice* and allow me to appear before this court until the conclusion of this case.

DATED: September 10, 2012

Respectfully submitted,

Miguel A. Pérez Vargas  
Supreme Court of PR No. 9578  
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By:   
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Attorneys for Edgewood Plaintiffs

**CERTIFICATE OF SERVICE**

I also certify that on September 10, 2012, I served the foregoing document via electronic mail to all parties listed below:

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CAUSE NO. D-1-GV-11-00130

TEXAS TAXPAYER & STUDENT  
FAIRNESS COALITION, *ET AL.*,

Plaintiffs,

EDGEWOOD INDEPENDENT SCHOOL  
DISTRICT, *ET AL.*, (consolidated)

Plaintiffs

v.

ROBERT SCOTT, in his official capacity as  
Commissioner of Education, *ET AL.*,

Defendants,

§ IN THE DISTRICT COURT  
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§ TRAVIS COUNTY, TEXAS  
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§  
§ 200TH JUDICIAL DISTRICT

**ORDER**

Before the Court is *Miguel A. Pérez Vargas's Motion Pro Hac Vice* on behalf of Edgewood I.S.D., et al., Plaintiffs in the above numbered and styled matter. The Court finds that the motion should be GRANTED. Accordingly, it is

ORDERED, that Miguel A. Pérez Vargas, State Bar No. 9578, is allowed to appear before this Court for the limited purpose of representing Plaintiffs in this matter.

SIGNED this \_\_\_\_\_ day of September, 2012.

\_\_\_\_\_  
DISTRICT COURT JUDGE